



MATTHEW L. SCHWARTZ  
Tel.: (212) 303-3646  
E-mail: mlschwartz@bsfllp.com

September 24, 2021

**BY ECF**

Hon. Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Alshahhi, et al.*, 21 Cr. 371 (BMC) (TAM)**

Dear Judge Cogan:

I represent Matthew Grimes, one of the defendants in the above-referenced case. I write to respectfully request the Court's permission for Mr. Grimes to travel to Charleston, South Carolina. Both Mr. Grimes's supervising Pretrial Services officers and the government have been provided a copy of Mr. Grimes' proposed itinerary, and both consent to this request.<sup>1</sup>

The proposed travel would be from September 30 to October 3, 2021. While travelling, Mr. Grimes would continue to be subject to GPS monitoring, would continue to be subject to a curfew, and would report to his Pretrial Services Officer as directed. Combined with the other conditions of his release including a substantial secured bond, I respectfully submit that Mr. Grimes is no risk of flight. The Court has previously permitted Mr. Grimes to travel on two other occasions, and Mr. Grimes has also travelled cross-country on several occasions (on notice to the government and Pretrial) to meet with counsel and/or attend court, as permitted by the conditions of his release. Each time, Mr. Grimes returned home on time and without incident.

Accordingly, on behalf of Mr. Grimes, I respectfully request that he be permitted to travel to South Carolina consistent with the itinerary transmitted to the government and Pretrial Services.

Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz  
Matthew L. Schwartz

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<sup>1</sup> Because Mr. Grimes resides outside the District, he is supervised by Pretrial Services officers in the Central District of California, under oversight from this Court's Pretrial Services Office. As has been the habit in this case, all of the relevant Pretrial Services personnel were provided notice of Mr. Grimes's itinerary. The two California-based officers who directly supervise Mr. Grimes reported that they had no objection to the proposed travel; the Brooklyn-based officer has not yet responded.



cc: Counsel of record (by ECF)  
Pretrial Services (by e-mail)